IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

NFC TECHNOLOGY, LLC, **Plaintiff,** **v.** **SAMSUNG ELECTRONICS CO., LTD., ET AL.,** **Defendants.**	**Civil Action No. 2:15-CV-00283-JRG-RSP** **The Hon. Rodney Gilstrap** **JURY TRIAL DEMANDED**

AMENDED JOINT CLAIM CONSTRUCTION CHART

Further to the Notice Regarding Resolution of Certain Claim Construction Disputes for U.S. Patent No. 7,098,770 filed February 17, 2016 (Dkt. No. 104), Plaintiff NFC Technology LLC ("NFCT") and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. ("Samsung") hereby submit this Amended Joint Claim Construction Chart in compliance with P.R. 4-5(d).

Attached hereto is the Amended Joint Claim Construction Chart that includes the disputed claim terms and phrases, the parties' respective proposed claim constructions, and a column for the Court's construction of the disputed claim terms and phrases.

Dated: February 22, 2016

Respectfully submitted,

/s/ John Mulcahy

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document and its accompanying exhibits via the Court's CM/ECF system per Local Rule CV-5(a)(3) on February 22, 2016.

/s/ Jeremy Miller
Jeremy Miller
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Joint Claim Construction Chart [P.R. 4-5(d)]

I. U.S. Patent No. 7,098,770 (Claims 1-3, 6-8, 10, 11, 13-15, 18-20, 23-25, 28-31, 34-37, 40, 42, 43, and 46)

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
Claim 1. A device in order to transmit/receive data by inductive coupling comprising:				
an **antenna circuit** to generate a magnetic field; and	"antenna circuit" Claims 1, 8, 13, 23, 28, 29, 30, 31, 36, and 42.	"a circuit, including a coil, for radiating and/or receiving a magnetic field"	Plain meaning which is "a circuit that radiates or receives electromagnetic waves"	
an **excitation circuit for delivering an alternating excitation signal to the antenna circuit**,	"excitation circuit for delivering/that delivers/to deliver an alternating excitation signal to the antenna circuit/respective antenna circuit" Claims 1, 13, 23, 28, 36, and 42.	Plain Meaning	Governed by 35 U.S.C § 112, ¶ 6. Function: to deliver alternating current to the antenna circuit / respective antenna circuit Structure: the circuit MDC1 of Figure 2, including at least the transistor T1, with its gate driven by alternating signal S1	

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
			and having its drain powered through inductor L1 by microprocessor ports, such as p1-p4 of Figure 2 as described in the specification at 5:39-6:16 and 6:46-55.	
the device being configured to operate in a first operating mode and a second operating mode,				
when in the first operating mode, **the device modulates the excitation signal** when data is transmitted, and	"the device modulates the excitation signal" Claim 1.	**[AGREED]**	**[AGREED]**	"the device varies the amplitude, frequency, or phase of the excitation signal to transmit data"
when in the second operating mode, the device applies a **load modulation signal** with two states to the antenna circuit when data is transmitted, so as to **simulate the operation of a contactless integrated circuit**,	"load modulation signal" Claims 1-3, 6, 8, 14-15, 21, 23-25, 29-31, 36-37, and 42-43.	"signal for transmitting data that causes a disturbance of a magnetic field generated by another device"	Indefinite	
	"contactless integrated circuit"	**[AGREED]**	**[AGREED]**	"passive device that does not send a magnetic field

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
	Claims 1, 8, 14, 18, 28, 30, 36, and 42.			and that sends data to a reader by short-circuiting its antenna circuit by means of a switch"
	"simulate the operation of a contactless integrated circuit" Claim 1.	**[AGREED]**	**[AGREED]**	"simulate the operation of a contactless integrated circuit without being a contactless integrated circuit"
the **load modulation signal** being configured to disturb a magnetic field generated by another device in order to transmit/receive data by inductive coupling and being configured to be **detected** by the other device **as if the load modulation signal were a load modulation signal applied to an antenna load modulation switch of a contactless integrated circuit**.	"load modulation signal" Claims 1-3, 6, 8, 14-15, 21, 23-25, 29-31, 36-37, and 42-43.	"signal for transmitting data that causes a disturbance of a magnetic field generated by another device"	Indefinite	
	"antenna load modulation switch" Claims 1, 14, 30, 36, and 42.	"switch connected to terminals of an antenna circuit through a resistor, to perform load modulation in a passive device"	"a switch coupled to the antenna circuit, the switch being driven by a load modulation signal to send data by changing the impedance of the antenna circuit"	
	"contactless	**[AGREED]**	**[AGREED]**	"passive device that does

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
	integrated circuit" Claims 1, 8, 14, 18, 28, 30, 36, and 42.			not send a magnetic field and that sends data to a reader by short-circuiting its antenna circuit by means of a switch"
	"detected . . . as if the load modulation signal were a load modulation signal applied to an antenna load modulation switch of a contactless integrated circuit" Claims 1, 14, 30, 36, and 42.	**[AGREED]**	**[AGREED]**	Plain Meaning
Claim 2. A device according to claim 1, wherein the **load modulation signal** of the second operating mode comprises data representative pulses of the excitation signal, the duration of each data representative pulse being longer than the period of	"load modulation signal" Claims 1-3, 6, 8, 14-15, 21, 23-25, 29-31, 36-37, and 42-43.	"signal for transmitting data that causes a disturbance of a magnetic field generated by another device"	Indefinite	

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
the excitation signal.				
Claim 3. A device according to claim 2, wherein the **load modulation signal** of the second operating mode comprises groups of data representative pulses of the excitation signal, the data representative pulses of a single group being generated at a frequency lower than the frequency of the excitation signal.	"load modulation signal" Claims 1-3, 6, 8, 14-15, 21, 23-25, 29-31, 36-37, and 42-43.	"signal for transmitting data that causes a disturbance of a magnetic field generated by another device"	Indefinite	
Claim 6. A device according to claim 1, wherein the **load modulation signal** of the second operating mode is controlled by at least one port of a logic circuit.	"load modulation signal" Claims 1-3, 6, 8, 14-15, 21, 23-25, 29-31, 36-37, and 42-43.	"signal for transmitting data that causes a disturbance of a magnetic field generated by another device"	Indefinite	
Claim 8. A device according to claim 1, further comprising: a first extraction circuit that extracts, in the first operating mode, a **load**	"antenna circuit" Claims 1, 8, 13, 23, 28, 29, 30, 31, 36, and 42.	"a circuit, including a coil, for radiating and/or receiving a magnetic field"	Plain meaning which is "a circuit that radiates or receives electromagnetic waves"	

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
modulation signal transmitted by a **contactless integrated circuit** from a signal present in the **antenna circuit**;	"load modulation signal" Claims 1-3, 6, 8, 14-15, 21, 23-25, 29-31, 36-37, and 42-43.	"signal for transmitting data that causes a disturbance of a magnetic field generated by another device"	Indefinite	
	"contactless integrated circuit" Claims 1, 8, 14, 18, 28, 30, 36, and 42.	**[AGREED]**	**[AGREED]**	"passive device that does not send a magnetic field and that sends data to a reader by short-circuiting its antenna circuit by means of a switch"
and a second extraction circuit that extracts from the antenna signal, in the second operating mode, an amplitude-modulated signal transmitted by the other device.				
Claim 10. A device according to claim 1, further comprising: **one of a bit and a flag** stored in a register to control switching from one of the first and second operating modes to the other of the	"one of a bit and a flag" Claims 10 and 28.	"a bit or a flag"	Indefinite. Or if the court construes this term Samsung proposes the construction "one of a bit and one of a flag"	

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
first and second operating modes.				
Claim 13. A method for transferring data from a first contactless integrated circuit reader to a second contactless integrated circuit reader,				
the first and second readers operating by inductive coupling,				
each of the first and second readers comprising an **antenna circuit** that generates a magnetic field	"antenna circuit" Claims 1, 8, 13, 23, 28, 29, 30, 31, 36, and 42.	"a circuit, including a coil, for radiating and/or receiving a magnetic field"	Plain meaning which is "a circuit that radiates or receives electromagnetic waves"	
and an **excitation circuit that delivers an alternating excitation signal to the respective antenna circuit**, the method comprising:	"excitation circuit for delivering/that delivers/to deliver an alternating excitation signal to the antenna circuit/respective antenna circuit" Claims 1, 13, 23, 28, 36, and 42.	Plain Meaning	Governed by 35 U.S.C § 112, ¶ 6. Function: to deliver alternating current to the antenna circuit / respective antenna circuit Structure: the circuit MDC1 of Figure 2, including at least the	

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
			transistor T1, with its gate driven by alternating signal S1 and having its drain powered through inductor L1 by microprocessor ports, such as p1-p4 of Figure 2 as described in the specification at 5:39-6:16 and 6:46-55.	
the first reader applying a data-carrying signal with two states to the antenna circuit of the first reader when data is to be transmitted to the second reader; and the second reader receiving the data-carrying signal by inductive coupling and extracting data from the received data-carrying signal.				
Claim 14. A method according to claim 13, wherein the data-carrying signal with two states is a	"load modulation signal"	"signal for transmitting data that causes a disturbance of a magnetic field	Indefinite	

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
load modulation signal comprising pulses of an alternating signal, the duration of each pulse being longer than the period of the alternating signal,	Claims 1-3, 6, 8, 14-15, 21, 23-25, 29-31, 36-37, and 42-43.	generated by another device"		
the **load modulation signal** being configured to disturb the magnetic field generated by the second reader and being configured to be **detected** by the second reader **as if the load modulation signal were a load modulation signal applied to an antenna load modulation switch of a contactless integrated circuit**.	"load modulation signal" Claims 1-3, 6, 8, 14-15, 21, 23-25, 29-31, 36-37, and 42-43.	"signal for transmitting data that causes a disturbance of a magnetic field generated by another device"	Indefinite	
	"contactless integrated circuit" Claims 1, 8, 14, 18, 28, 30, 36, and 42.	**[AGREED]**	**[AGREED]**	"passive device that does not send a magnetic field and that sends data to a reader by short-circuiting its antenna circuit by means of a switch"
	"antenna load modulation switch" Claims 1, 14, 30, 36, and 42.	"switch connected to terminals of an antenna circuit through a resistor, to perform load modulation in a passive device"	"a switch coupled to the antenna circuit, the switch being driven by a load modulation signal to send data by changing the impedance of the	

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
			antenna circuit"	
	"detected . . . as if the load modulation signal were a load modulation signal applied to an antenna load modulation switch of a contactless integrated circuit" Claims 1, 14, 30, 36, and 42.	**[AGREED]**	**[AGREED]**	Plain Meaning
Claim 15. A method according to claim 14, wherein the **load modulation signal** comprises groups of pulses of the excitation signal, the pulses of a single group being generated at a frequency lower than the frequency of the excitation signal.	"load modulation signal" Claims 1-3, 6, 8, 14-15, 21, 23-25, 29-31, 36-37, and 42-43.	"signal for transmitting data that causes a disturbance of a magnetic field generated by another device"	Indefinite	
Claim 18. A method according to claim 13, wherein the data-carrying signal with two states is the	"contactless integrated circuit"	**[AGREED]**	**[AGREED]**	"passive device that does not send a magnetic field and that sends data to a reader by short-circuiting

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
excitation signal with an amplitude modulation, as if the second reader were a **contactless integrated circuit**.	Claims 1, 8, 14, 18, 28, 30, 36, and 42.			its antenna circuit by means of a switch"
Claim 23. A method for transferring data from a first contactless integrated circuit reader to a second contactless integrated circuit reader and for transferring data from the second contactless integrated circuit reader to the first contactless integrated circuit reader, the first and second contactless readers operating by inductive coupling, each of the first and second contactless readers including an **antenna circuit** to generate a magnetic field and	"antenna circuit" Claims 1, 8, 13, 23, 28, 29, 30, 31, 36, and 42.	"a circuit, including a coil, for radiating and/or receiving a magnetic field"	Plain meaning which is "a circuit that radiates or receives electromagnetic waves"	
an **excitation circuit that delivers an alternating excitation signal to the antenna circuit**, the method comprising:	"excitation circuit for delivering/that delivers/to deliver an alternating excitation signal to the antenna	Plain Meaning	Governed by 35 U.S.C § 112, ¶ 6. Function: to deliver alternating current to the antenna circuit /	

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
	circuit/respective antenna circuit" Claims 1, 13, 23, 28, 36, and 42.		respective antenna circuit Structure: the circuit MDC1 of Figure 2, including at least the transistor T1, with its gate driven by alternating signal S1 and having its drain powered through inductor L1 by microprocessor ports, such as p1-p4 of Figure 2 as described in the specification at 5:39-6:16 and 6:46-55.	
when data is transferred from the first to the second reader:				
the second reader generating a magnetic field; the first reader applying a data-carrying **load modulation signal** with two states to the antenna circuit of the first reader, the **load modulation signal**	"load modulation signal" Claims 1-3, 6, 8, 14-15, 21, 23-25, 29-31, 36-37, and 42-43.	"signal for transmitting data that causes a disturbance of a magnetic field generated by another device"	Indefinite	

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
disturbing the magnetic field generated by the second reader; and the second reader extracting the data-carrying **load modulation signal** from the antenna coil of the second reader and extracting data from the data-carrying **load modulation signal**; and				
when data is transferred from the second to the first reader:				
the second reader **generating a magnetic field and modulating the amplitude of the magnetic field** in accordance with data to be transmitted, and	"generating a magnetic field and modulating the amplitude of the magnetic field" Claim 23.	**[AGREED]**	**[AGREED]**	"generating a magnetic field and varying the amplitude of the magnetic field to transmit data"
the first reader receiving an image signal of the amplitude-modulated magnetic field and extracting data from the image signal.				

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
Claim 24. A method according to claim 23, wherein the data-carrying **load modulation signal** comprises data representative pulses of an alternating signal, the duration of each data representative pulse being longer than the period of the alternating signal.	"load modulation signal" Claims 1-3, 6, 8, 14-15, 21, 23-25, 29-31, 36-37, and 42-43.	"signal for transmitting data that causes a disturbance of a magnetic field generated by another device"	Indefinite	
Claim 25. A method according to claim 24, wherein the data-carrying **load modulation signal** comprises groups of data representative pulses of the excitation signal, the data representative pulses of a single group being emitted at a frequency lower than the frequency of the excitation signal.	"load modulation signal" Claims 1-3, 6, 8, 14-15, 21, 23-25, 29-31, 36-37, and 42-43.	"signal for transmitting data that causes a disturbance of a magnetic field generated by another device"	Indefinite	
Claim 28. A contactless integrated circuit reader comprising:				
an **antenna circuit** that generates a magnetic field;	"antenna circuit"	"a circuit, including a coil, for radiating	Plain meaning which is "a circuit that	

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
	Claims 1, 8, 13, 23, 28, 29, 30, 31, 36, and 42	and/or receiving a magnetic field"	radiates or receives electromagnetic waves"	
and an **excitation circuit to deliver an alternating excitation signal to the antenna circuit**,	"excitation circuit for delivering/that delivers/to deliver an alternating excitation signal to the antenna circuit/respective antenna circuit" Claims 1, 13, 23, 28, 36, and 42.	Plain Meaning	Governed by 35 U.S.C § 112, ¶ 6. Function: to deliver alternating current to the antenna circuit / respective antenna circuit Structure: the circuit MDC1 of Figure 2, including at least the transistor T1, with its gate driven by alternating signal S1 and having its drain powered through inductor L1 by microprocessor ports, such as p1-p4 of Figure 2 as described in the specification at 5:39-6:16 and 6:46-55.	
the reader including a first operating mode and a				

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
second operating mode,				
when in the first operating mode, the reader is configured to exchange data with a **contactless integrated circuit**, and	"contactless integrated circuit" Claims 1, 8, 14, 18, 28, 30, 36, and 42.	**[AGREED]**	**[AGREED]**	"passive device that does not send a magnetic field and that sends data to a reader by short-circuiting its antenna circuit by means of a switch"
when in the second operating mode, the reader is configured to exchange data with another contactless integrated circuit reader,				
the reader includes **one of a bit and a flag** to switch the reader from one of the first and second operating modes to the other of the first and second operating modes.	"one of a bit and a flag" Claims 10 and 28.	"a bit or a flag"	Indefinite. Or if the court construes this term Samsung proposes the construction "one of a bit and one of a flag"	
Claim 29. A reader according to claim 28, wherein the reader is configured to apply a **load modulation signal** with two states to the **antenna circuit** when the reader operates in the second	"antenna circuit" Claims 1, 8, 13, 23, 28, 29, 30, 31, 36, and 42.	"a circuit, including a coil, for radiating and/or receiving a magnetic field"	Plain meaning which is "a circuit that radiates or receives electromagnetic waves"	
	"load modulation	"signal for	Indefinite	

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
operating mode and when data is to be transmitted to the other reader.	signal" Claims 1-3, 6, 8, 14-15, 21, 23-25, 29-31, 36-37, and 42-43.	transmitting data that causes a disturbance of a magnetic field generated by another device"		
Claim 30. A reader according to claim 29, wherein the reader is configured to apply to the **antenna circuit** a **load modulation signal** comprising pulses of an alternating signal, the duration of each pulse being longer than the period of the alternating signal,	"antenna circuit" Claims 1, 8, 13, 23, 28, 29, 30, 31, 36, and 42.	"a circuit, including a coil, for radiating and/or receiving a magnetic field"	Plain meaning which is "a circuit that radiates or receives electromagnetic waves"	
	"load modulation signal" Claims 1-3, 6, 8, 14-15, 21, 23-25, 29-31, 36-37, and 42-43.	"signal for transmitting data that causes a disturbance of a magnetic field generated by another device"	Indefinite	
the **load modulation signal** being configured to disturb the magnetic field generated by the second reader and being configured to be **detected** by the second reader **as if the load modulation signal were a load modulation signal applied**	"load modulation signal" Claims 1-3, 6, 8, 14-15, 21, 23-25, 29-31, 36-37, and 42-43.	"signal for transmitting data that causes a disturbance of a magnetic field generated by another device"	Indefinite	
	"contactless integrated circuit"	**[AGREED]**	**[AGREED]**	"passive device that does not send a magnetic field and that sends data to a

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
to an antenna load modulation switch of a contactless integrated circuit.	Claims 1, 8, 14, 18, 28, 30, 36, and 42.			reader by short-circuiting its antenna circuit by means of a switch"
	"antenna load modulation switch" Claims 1, 14, 30, 36, and 42.	"switch connected to terminals of an antenna circuit through a resistor, to perform load modulation in a passive device"	"a switch coupled to the antenna circuit, the switch being driven by a load modulation signal to send data by changing the impedance of the antenna circuit"	
	"detected . . . as if the load modulation signal were a load modulation signal applied to an antenna load modulation switch of a contactless integrated circuit" Claims 1, 14, 30, 36, and 42.	**[AGREED]**	**[AGREED]**	Plain Meaning
Claim 31. A reader according to claim 30, wherein the reader is	"antenna circuit" Claims 1, 8, 13, 23,	"a circuit, including a coil, for radiating and/or receiving a	Plain meaning which is "a circuit that radiates or receives	

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
configured to apply to the **antenna circuit** a **load modulation signal** comprising groups of data representative pulses of the excitation signal, the data representative pulses of a single group being emitted at a frequency lower than the frequency of the excitation signal.	28, 29, 30, 31, 36, and 42	magnetic field"	electromagnetic waves"	
	"load modulation signal" Claims 1-3, 6, 8, 14-15, 21, 23-25, 29-31, 36-37, and 42-43.	"signal for transmitting data that causes a disturbance of a magnetic field generated by another device"	Indefinite	
Claim 36. A data transmission system comprising a first device and a second device				
that each exchange data by inductive coupling,				
each device comprising: an **antenna circuit** that generates a magnetic field;	"antenna circuit" Claims 1, 8, 13, 23, 28, 29, 30, 31, 36, and 42	"a circuit, including a coil, for radiating and/or receiving a magnetic field"	Plain meaning which is "a circuit that radiates or receives electromagnetic waves"	
an **excitation circuit that delivers an alternating excitation signal to the antenna circuit**,	"excitation circuit for delivering/that delivers/to deliver an alternating excitation signal to the antenna	Plain Meaning	Governed by 35 U.S.C § 112, ¶ 6. Function: to deliver alternating current to	

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
	circuit/respective antenna circuit" Claims 1, 13, 23, 28, 36, and 42.		the antenna circuit / respective antenna circuit Structure: the circuit MDC1 of Figure 2, including at least the transistor T1, with its gate driven by alternating signal S1 and having its drain powered through inductor L1 by microprocessor ports, such as p1-p4 of Figure 2 as described in the specification at 5:39-6:16 and 6:46-55.	
wherein the first device is configured to perform at least one operation in each of the three following groups of operations and the second device is configured to perform at least one complementary operation in each of the three following groups of operations, depending	"whatever operation is acceptable" Claim 36.	Plain Meaning	Indefinite	

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
whatever operation is acceptable to the first device:				
operations for transmitting data:				
transmitting data to the other device by applying a **load modulation signal** with two states to the antenna circuit, the **load modulation signal** being capable of disturbing the magnetic field generated by the other device and of being **detected** by the other device **as if the load modulation signal were a load modulation signal applied to an antenna load modulation switch of a contactless integrated circuit**,	"load modulation signal" Claims 1-3, 6, 8, 14-15, 21, 23-25, 29-31, 36-37, and 42-43.	"signal for transmitting data that causes a disturbance of a magnetic field generated by another device"	Indefinite	
	"contactless integrated circuit" Claims 1, 8, 14, 18, 28, 30, 36, and 42.	**[AGREED]**	**[AGREED]**	"passive device that does not send a magnetic field and that sends data to a reader by short-circuiting its antenna circuit by means of a switch"
	"antenna load modulation switch" Claims 1, 14, 30, 36, and 42.	"switch connected to terminals of an antenna circuit through a resistor, to perform load modulation in a passive device"	"a switch coupled to the antenna circuit, the switch being driven by a load modulation signal to send data by changing the impedance of the antenna circuit"	

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
	"detected . . . as if the load modulation signal were a load modulation signal applied to an antenna load modulation switch of a contactless integrated circuit" Claims 1, 14, 30, 36, and 42.	**[AGREED]**	**[AGREED]**	Plain Meaning
and transmitting data to the other device by **modulating the amplitude of the generated magnetic field**, as if the other device were a **contactless integrated circuit**;	"modulating the amplitude of the generated magnetic field" Claim 36 and 42.	**[AGREED]**	**[AGREED]**	"varying the amplitude of the generated magnetic field to transmit data"
	"contactless integrated circuit" Claims 1, 8, 14, 18, 28, 30, 36, and 42	**[AGREED]**	**[AGREED]**	"passive device that does not send a magnetic field and that sends data to a reader by short-circuiting its antenna circuit by means of a switch"
operations for receiving data:				

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
not generating the magnetic field when data is to be received from the other device, and generating the magnetic field when data is to be received from the other device; and				
operations when no data is to be transmitted and when no data is to be received:				
not generating the magnetic field, and generating the magnetic field.				
Claim 37. A data transmission system according to claim 36, wherein at least one of the first and second devices is configured so that the **load modulation signal** comprises pulses of the excitation signal, the duration of each pulse being longer than the period of the excitation signal.	"load modulation signal" Claims 1-3, 6, 8, 14-15, 21, 23-25, 29-31, 36-37, and 42-43.	"signal for transmitting data that causes a disturbance of a magnetic field generated by another device"	Indefinite	
Claim 42. A data				

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
transmission system comprising a first device and a second device that each transmit/receive data by inductive coupling,				
each device comprising: an **antenna circuit** that generates a magnetic field;	"antenna circuit" Claims 1, 8, 13, 23, 28, 29, 30, 31, 36, and 42.	"a circuit, including a coil, for radiating and/or receiving a magnetic field"	Plain meaning which is "a circuit that radiates or receives electromagnetic waves"	
and an **excitation circuit that delivers an alternating excitation signal to the antenna circuit**,	"excitation circuit for delivering/that delivers/to deliver an alternating excitation signal to the antenna circuit/respective antenna circuit" Claims 1, 13, 23, 28, 36, and 42.	Plain Meaning	Governed by 35 U.S.C § 112, ¶ 6. Function: to deliver alternating current to the antenna circuit / respective antenna circuit Structure: the circuit MDC1 of Figure 2, including at least the transistor T1, with its gate driven by alternating signal S1 and having its drain powered through inductor L1 by microprocessor ports, such as p1-p4	

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
			of Figure 2 as described in the specification at 5:39-6:16 and 6:46-55.	
wherein the first device is configured to perform at least two of the following operations and **the second device is configured to be responsive to at least one such operation when performed by the first device**:	"the second device is configured to be responsive to at least one such operation when performed by the first device" Claim 42.	Plain Meaning	Indefinite	
transmitting data to another device by applying a **load modulation signal** with two states to the antenna circuit, the **load modulation signal** being capable of disturbing the magnetic field generated by the other device and of being **detected** by the other device **as if the load modulation signal were a load modulation signal applied to an antenna load modulation switch of a contactless integrated**	"load modulation signal" Claims 1-3, 6, 8, 14-15, 21, 23-25, 29-31, 36-37, and 42-43.	"signal for transmitting data that causes a disturbance of a magnetic field generated by another device"	Indefinite	
	"contactless integrated circuit" Claims 1, 8, 14, 18, 28, 30, 36, and 42.	**[AGREED]**	**[AGREED]**	"passive device that does not send a magnetic field and that sends data to a reader by short-circuiting its antenna circuit by means of a switch"
	"antenna load	"switch connected to terminals of an	"a switch coupled to the antenna circuit,	

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
circuit;	modulation switch" Claims 1, 14, 30, 36, and 42.	antenna circuit through a resistor, to perform load modulation in a passive device"	the switch being driven by a load modulation signal to send data by changing the impedance of the antenna circuit"	
	"detected . . . as if the load modulation signal were a load modulation signal applied to an antenna load modulation switch of a contactless integrated circuit" Claims 1, 14, 30, 36, and 42.	**[AGREED]**	**[AGREED]**	Plain Meaning
transmitting data to another device by **modulating the amplitude of the generated magnetic field**, as if the other device were a **contactless integrated circuit**;	"modulating the amplitude of the generated magnetic field" Claim 36 and 42.	**[AGREED]**	**[AGREED]**	"varying the amplitude of the generated magnetic field to transmit data"
	"contactless integrated circuit"	**[AGREED]**	**[AGREED]**	"passive device that does not send a magnetic field

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
	Claims 1, 8, 14, 18, 28, 30, 36, and 42.			and that sends data to a reader by short-circuiting its antenna circuit by means of a switch"
not generating the magnetic field when no data is to be transmitted and when no data is to be received;				
not generating the magnetic field when data is to be received from another device;				
and generating the magnetic field when data is to be received from another device.				
Claim 43. A data transmission system according to claim 42, wherein at least one of the first and second devices is configured so that the **load modulation signal** comprises pulses of the excitation signal, the duration of each pulse being longer than the period of the excitation	"load modulation signal" Claims 1-3, 6, 8, 14-15, 21, 23-25, 29-31, 36-37, and 42-43.	"signal for transmitting data that causes a disturbance of a magnetic field generated by another device"	Indefinite	

Claim Language of U.S. Patent No. 7,098,770	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
signal.				

II. U.S. Patent No. 7,905,419 (Claims 1, 3, 4, 7, 11, 12, 14, 15, 18, and 22)

Claim Language of U.S. Patent No. 7,905,419	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
Claim 1. A method for routing data in a chipset arranged in a portable device, the chipset comprising				
at least one host processor,				
a controller,				
and a Near Field Communication (NFC)-type **contactless data send/receive interface**, the method comprising:	"contactless data send/receive interface" Claims 1, 4, 7, 12, 15, and 18.	**[AGREED]**	**[AGREED]**	Plain Meaning
causing **a source point located in the host processor** in the portable device to send a **command for opening a first data path designating a destination point** located in the **contactless data send/receive interface** in the portable device;	"contactless data send/receive interface" Claims 1, 4, 7, 12, 15, and 18.	**[AGREED]**	**[AGREED]**	Plain Meaning
	"a source point located in the host processor"	"software in a host processor through which data is sent"	"location within the host processor from which a data stream	

Claim Language of U.S. Patent No. 7,905,419	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
	Claims 1 and 12.		originates"	
	"destination point" Claims 1, 12, and 18.	"software through which data is received"	"location receiving a data stream"	
	"command for opening a first data path designating a destination point" / "command for opening a first data path . . . designating a destination point" Claims 1 and 12.	"command for making accessible a first data path that designates a destination point"	"command that opens a first data path to a destination point designated in the command"	
in response to the command for opening the first data path, defining, by the controller in the portable device, the first data path by allocating to the first data path a routing channel number and by saving in a **routing table** the routing channel number	"routing table" Claims 1, 3, 4, 12, 14 and 15.	"a collection of data including at least one routing channel number and corresponding routing parameter(s)"	"data structure maintained in the controller comprising a table in which data paths are saved"	
	"destination point" Claims 1, 12, and	"software through which data is received"	"location receiving a data stream"	

Claim Language of U.S. Patent No. 7,905,419	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
and routing parameters comprising at least one identifier of the source point and one identifier of the **destination point**;	18.			
causing the source point to send to the controller data encapsulated in a frame having a header field comprising the routing channel number; and				
upon receiving the data encapsulated in the frame having a header field comprising the routing channel number, causing the controller to search for a **destination point** of the data in the **routing table** by using the routing channel number as an index to select the **destination point** to which the controller subsequently sends the data.	"routing table" Claims 1, 3, 4, 12, 14 and 15.	"a collection of data including at least one routing channel number and corresponding routing parameter(s)"	"data structure maintained in the controller comprising a table in which data paths are saved"	
	"destination point" Claims 1, 12, and 18.	"software through which data is received"	"location receiving a data stream"	
Claim 3. The method of claim 1, implemented in a chipset comprising at least				

Claim Language of U.S. Patent No. 7,905,419	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
two host processors,				
wherein the controller also uses the **routing table** to open a second data path between the two host processors.	"routing table" Claims 1, 3, 4, 12, 14 and 15.	"a collection of data including at least one routing channel number and corresponding routing parameter(s)"	"data structure maintained in the controller comprising a table in which data paths are saved"	
Claim 4. The method of claim 1, wherein the controller uses commands for creating data paths comprising both routing parameters and **configuration parameters for configuring the contactless data send/receive interface**,	"contactless data send/receive interface" Claims 1, 4, 7, 12, 15, and 18.	**[AGREED]**	**[AGREED]**	Plain Meaning
	"configuration parameters for configuring the contactless data send/receive interface" Claims 4 and 15.	**[AGREED]**	**[AGREED]**	Plain Meaning
and saves the routing parameters and the configuration parameters in the **routing table**.	"routing table" Claims 1, 3, 4, 12, 14 and 15.	"a collection of data including at least one routing channel number and corresponding routing	"data structure maintained in the controller comprising a table in which data paths are	

Claim Language of U.S. Patent No. 7,905,419	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
		parameter(s)"	saved"	
Claim 7. The method of claim 1, implemented in a chipset comprising at least two host processors, and				
wherein, when data is received by the **contactless data send/receive interface** via a contactless data transmission channel,	"contactless data send/receive interface" Claims 1, 4, 7, 12, 15, and 18.	**[AGREED]**	**[AGREED]**	Plain Meaning
the controller identifies at least one recipient host processor of the data using at least as determination criteria the operating mode and the contactless communication protocol used by the contactless data send/receive interface to create the contactless data transmission channel through which the data is received.	"the controller identifies at least one recipient host processor of the data using at least as determination criteria the operating mode and the contactless communication protocol used by the contactless data send/receive interface"	**[AGREED]**	**[AGREED]**	Plain Meaning

Claim Language of U.S. Patent No. 7,905,419	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
	Claim 7.			
Claim 12. A chipset for sending/receiving data comprising				
a Near Field Communication (NFC)-type **contactless data send/receive interface**, a controller, and at least one input/output port to link the **contactless data send/receive interface** to a host processor, the contactless interface, the controller, and the host processor being arranged in a portable device, the controller being configured to:	"contactless data send/receive interface" Claims 1, 4, 7, 12, 15, and 18.	**[AGREED]**	**[AGREED]**	Plain Meaning
in response to a **command for opening a first data path** sent by **a source point located in a host processor** and **designating a destination point** located in the **contactless data send/receive**	"contactless data send/receive interface" Claims 1, 4, 7, 12, 15, and 18.	**[AGREED]**	**[AGREED]**	Plain Meaning
	"a source point	"software in a host	"location within the	

Claim Language of U.S. Patent No. 7,905,419	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
interface,	located in the host processor" Claims 1 and 12.	processor through which data is sent"	host processor from which a data stream originates"	
	"destination point" Claims 1, 12, and 18.	"software through which data is received"	"location receiving a data stream"	
	"command for opening a first data path designating a destination point" / "command for opening a first data path . . . designating a destination point" Claims 1 and 12.	"command for making accessible a first data path that designates a destination point"	"command that opens a first data path to a destination point designated in the command"	
open the first data path between the source point and a **destination point** by allocating to the first data path a routing channel number and by saving in a **routing table** the routing channel number and	"destination point" Claims 1, 12, and 18.	"software through which data is received"	"location receiving a data stream"	
	"routing table"	"a collection of data including at least one	"data structure maintained in the	

Claim Language of U.S. Patent No. 7,905,419	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
routing parameters comprising at least one identifier of the source point and one identifier of the **destination point**; and	Claims 1, 3, 4, 12, 14 and 15.	routing channel number and corresponding routing parameter(s)"	controller comprising a table in which data paths are saved"	
upon receiving data from the source point encapsulated in a frame having a header field comprising the routing channel number, search for a **destination point** of the data in the **routing table** using the routing channel number as index to select the **destination point** to which the controller is configured to send the data.	"destination point" Claims 1, 12, and 18.	"software through which data is received"	"location receiving a data stream"	
	"routing table" Claims 1, 3, 4, 12, 14 and 15.	"a collection of data including at least one routing channel number and corresponding routing parameter(s)"	"data structure maintained in the controller comprising a table in which data paths are saved"	
Claim 14. The chipset of claim 12, comprising at least two input/output ports and				
wherein the controller also uses the **routing table** to open a second data path between two host processors.	"routing table" Claims 1, 3, 4, 12, 14 and 15.	"a collection of data including at least one routing channel number and corresponding routing	"data structure maintained in the controller comprising a table in which data paths are	

Claim Language of U.S. Patent No. 7,905,419	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
		parameter(s)"	saved"	
Claim 15. The chipset of claim 12, wherein the controller is configured to decode commands for creating data paths comprising routing parameters and **configuration parameters for configuring the contactless data send/receive interface**,	"contactless data send/receive interface" Claims 1, 4, 7, 12, 15, and 18.	**[AGREED]**	**[AGREED]**	Plain Meaning
	"configuration parameters for configuring the contactless data send/receive interface" Claims 4 and 15.	**[AGREED]**	**[AGREED]**	Plain Meaning
and to save in the **routing table** the routing and configuration parameters present in the commands.	"routing table" Claims 1, 3, 4, 12, 14 and 15.	"a collection of data including at least one routing channel number and corresponding routing parameter(s)"	"data structure maintained in the controller comprising a table in which data paths are saved"	
Claim 18. The chipset of claim 12, wherein the controller or the **contactless data send/receive interface** is	"contactless data send/receive interface"	**[AGREED]**	**[AGREED]**	Plain Meaning

Claim Language of U.S. Patent No. 7,905,419	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
configured to, when data are received by the **contactless data send/receive interface** via a contactless data transmission channel,	Claims 1, 4, 7, 12, 15, and 18.			
determine a destination point of the data by using as determination criteria the operating mode and the contactless communication protocol used by the contactless data send/receive interface to create the contactless data transmission channel through which the data are received.	"determine a destination point of the data by using as determination criteria the operating mode and the contactless communication protocol used by the contactless data send/receive interface" Claim 18.	**[AGREED]**	**[AGREED]**	Plain Meaning
	"contactless data send/receive interface" Claims 1, 4, 7, 12, 15, and 18.	**[AGREED]**	**[AGREED]**	Plain Meaning

Claim Language of U.S. Patent No. 7,905,419	Disputed Term	NFCT's Construction	Samsung's Construction	Court's Construction
	"destination point" Claims 1, 12, and 18.	"software through which data is received"	"location receiving a data stream"	